



February 2, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

**Re: Comments of Mineral Associations Coalition Regarding Reissuance of the
Storm Water Industrial General Permit – Draft Permit Documents issued
December 15, 2004**

Dear Ms. Irvin:

These comments are offered on behalf of the Mineral Associations Coalition (MAC), which includes the Construction Materials Association of California, California Mining Association, and Southern California Rock Products Association.

The MAC coalition represents producers of aggregates, ready mixed concrete, industrial, and other minerals from throughout California. These companies provide the essential materials to build California's roads, homes, buildings and bridges and fuel California's construction and manufacturing processes, as well as provide jobs and revenues in their communities. In all, the aggregate and mineral industries contribute directly over \$4 billion to California's economy.

Protection of California's water resources is an important objective of the coalition, and while this proposal offers several clarifications and improvements, we also have several concerns, including the following:

- *Corrective Actions.* Many of the actions and timelines required are not practicable for all facilities and all times of the year. Some corrective actions need to wait until the dry season, and this proposal does not provide that flexibility.
- *Natural constituents.* The proposal does not address situations where stormwater sampling may detect natural constituents.
- *BMPs and Covered Materials.* Many of the required BMPs are impractical at aggregate and related facilities. For instance, covering material stockpiles would be impractical, since they are constantly subject to use by mechanized equipment.